

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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JOHNNIE FLANAGAN, LAURA CHAPMAN  
individually and on behalf of other persons  
similarly situated,

Plaintiffs,

No. 6:25-cv-06225-FPG

v.

PUBLIC PARTNERSHIPS, LLC,

Defendant.

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**DEFENDANT’S NOTICE OF MOTION AND MOTION TO DISMISS THE  
COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(7) AND  
TO STRIKE PLAINTIFFS’ CLASS ALLEGATIONS PURSUANT TO  
FED. R. CIV. P. 12(f), 23(c)(1)(A), AND 23(d)(1)(D)**

**PLEASE TAKE NOTICE** that, based on the pleadings provided herewith, the Declaration of Maria Perrin, and the accompanying Memorandum of Law, and pursuant to Federal Rule of Civil Procedure 12(b)(7), 12(f), 23(c)(1)(A), and 23(d)(1)(D), Defendant Public Partnerships, LLC moves for an Order granting dismissal of this case, or, in the alternative, an Order striking Plaintiffs’ class allegations. This Motion shall be heard at a time and date to be set by the Court at the United States District Court for the Western District of New York, 100 State Street, Rochester, New York 14614. Defendant intends to file and serve reply papers in the event that plaintiffs oppose this motion.

Dated: June 20, 2025

PIERSON FERDINAND, LLP



s/Gerald T. Hathaway

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Attachments

- Complaint, attached as Exhibit 1
- Declaration of Maria Perrin, attached as Exhibit 2
- Defendant's Memorandum of Law in Support of its Motion to Dismiss Complaint, or, in the Alternative, to Strike Plaintiff's Class Allegations

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